



FRED WILLIAMSON & ASSOCIATES, INC.
Telecommunications Management Services

VIA ECFS

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of Secretary
445 12th Street, S. W.
Washington, D.C. 20554

July 1st. 2017

RE: Submission of information Pursuant to FCC 54.313 Rules and Request
for Confidential Treatment – ETC Annual Reports and Certifications WC
Docket Nos. 10-90 and 14-58

Dear Ms. Dortch:

In accordance with the annual reporting requirements of 47 C.F.R. §§54.313 and 54.422, **TOTAH COMMUNICATIONS, INC. – KANSAS** or “**Totah KS**” (Study Area Code 412030), is submitting a completed FCC Form 481 to the Commission via its Electronic Comment Filing System (ECFS) in WC Docket Nos. 10-90 and 14-58. Totah KS by its authorized representative, hereby requests confidential treatment of one attachments to its FCC Form 481: the RUS Annual Telecommunications Operating Report identified on Line 3005, which was redacted in the ECFS submission.

The request for confidential treatment of the financial annual report is being made pursuant to the FCC's March 22, 2016 Protective Order in WC Docket Nos. 10-90 and 14-58. The financial reports contain competitively sensitive data that is not otherwise available from publically available sources.

The request for confidential treatment is being made pursuant to section 0.459 of the Commission's rules and Exemption 4 of the Freedom of Information Act (FOIA).

Total KS keeps this information strictly confidential and it is subject to protection under the Freedom of Information Act (FOIA) and the Commission's implementing rules. Release of this information would have a substantial negative impact on the Company.

Total KS is also transmitting the following information to the Commission in compliance with C.F.R. §§54.313 and 54.422:

- Submission to the Office of the Secretary, this cover letter and the Form 481 filing which includes the confidential information that is being requested to be withheld from public inspection. Confidential information has been designated in accordance with Confidentiality guidelines and the Protective Order.

The confidential information has also been submitted to the Universal Service Administrative Company through its E-File system as an attachment to the FCC Form 481.

Totah KS requests that the information contained in its annual financial report be withheld from public inspection because it contains competitively sensitive commercial and financial information that the Company keeps confidential. Public availability of this information would have a substantial negative impact on the Company.

Totah KS offers the following information pursuant to section 0.459 of the Commission's rules and Exemption 4 of FOIA in support of this request:

(1) Identification of the specific information for which confidential treatment is sought:

Attachment to Line 3005 of FCC Form 481 – RUS Operating Report. Specifically, confidential treatment is sought for all information in the report.

(2) Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission:

The information was submitted in WC Docket Nos. 10-90 and 14-58 as an attachment to FCC Form 481- the Carrier Annual Reporting Data Collection Form.

(3) Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged:

The RUS Operating Report for Telecommunication Borrowers contains financial information and subscriber counts for a privately held company, which is not made publicly available.

(4) Explanation of the degree to which the information concerns a service that is subject to competition:

Broadband is subject to increasing competition in the areas served by rural, rate-of-return incumbent local exchange carriers (RLECs). Virtually all RLECs face competition from one or more Internet service providers.

(5) Explanation of how disclosure of the information could result in substantial competitive harm:

Disclosure of the information contained in the operating report would provide competitors with detailed information regarding the Company's financial position. This would provide competitors access to confidential information they could employ to develop their own plans in a particular service area. This could cause competitive harm to the Company.

(6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure:

The Company has continually treated financial information as confidential and carefully controls the information to protect it from competitors.

(7) Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties:

The redacted information in the RUS Operating Report are not available to the public, and third party access is limited as described in (6) above.

(8) Justification of the period during which the submitting party asserts that material should not be available for public disclosure:

The Company requests that the extracted information be withheld from public inspection indefinitely. The information and financial details would provide valuable information to competitors for several years beyond that period.

(9) Any other information that the party seeking confidential information treatment believes may be useful in assessing whether its request for confidentiality should be granted:

Exemption 4 of FOIA shields from public disclosure commercial or financial information obtained from a person that is privileged or confidential. Based on the responses provided above, the information in question satisfies this test.

Please contact me if you have any questions.

Sincerely,

Tim Morrissey

President,

FWA, Inc.

121 East College Street • Broken Arrow, OK 74012 • 918-298-1618

Redacted - For Public Inspection

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	412030
<015>	Study Area Name	TOTAH COMMUNICATIONS
<020>	Program Year	2018
<030>	Contact Name: Person USAC should contact with questions about this data	Mark M Gailey
<035>	Contact Telephone Number: Number of the person identified in data line <030>	9185352208 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	mmgailey@totelcsi.com
	Form Type	54.313 and 54.422

<010>	Study Area Code	412030
<015>	Study Area Name	TOTAH COMMUNICATIONS
<020>	Program Year	2018
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<035>	Contact Telephone Number - Number of person identified in data line <030>	9185352208 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mugailey@totalcsi.com

<210> For the prior calendar year, were there any reportable voice service outages? No

Page 2

**(300) Unfulfilled Service Request
Data Collection Form**FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	mmgailey@totelcsi.com

<300> Unfulfilled service request (voice)

0

<310> Detail on attempts (voice)

Name of Attached Document

<320> Unfulfilled service request (broadband)

0

<330> Detail on attempts (broadband)

Name of Attached Document

<010>	Study Area Code	412030
<015>	Study Area Name	TOTAH COMMUNICATIONS
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Mark M Gailey
<035>	Contact Telephone Number - Number of person identified in data line <030>	9185352208 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mmgailey@totalcsi.com
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed voice	
<410>	Complaints per 1000 customers for fixed voice	0 . 0
<420>	Complaints per 1000 customers for mobile voice	
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed broadband	
<440>	Complaints per 1000 customers for fixed broadband	0 . 0
<450>	Complaints per 1000 customers for mobile broadband	

<010>	Study Area Code	412030
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<039>	Contact Email Address - Email Address of person identified in data line <030>	mmgailey@totalcsi.com
<500>	Certify compliance with applicable service quality standards and consumer protection rules	Yes
412030KS510 .pdf		
<510>	Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	
<515>	Certify compliance with applicable minimum service standards	

(600) Functionality in Emergency Situations		FCC Form 481
Data Collection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819
		July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	mmgailey@totelcsi.com
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	412030KS610.pdf

<010>	Study Area Code	412030
<015>	Study Area Name	TOTAH COMMUNICATIONS
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Mark M Gailey
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<039>	Contact Email Address - Email Address of person identified in data line <030>	mmgailey@totalcsi.com

-- See attached worksheet --

**(800) Operating Companies
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	mmgailey@totelcsi.com
<810>	Reporting Carrier	Totah Communications, Inc.
<811>	Holding Company	Totah Communications, Inc.
<812>	Operating Company	Totah Communications, Inc.

[illegible]

**(900) Tribal Lands Reporting
Data Collection Form**

 FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	mmgailey@totelcsi.com

<900> Does the filing entity offer tribal land services? (Y/N) No

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable

**(1000) Voice and Broadband Service Rate Comparability
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	mmgailey@totelcsi.com

<1000> Voice services rate comparability certification Yes

<1010> Attach detailed description for voice services rate comparability compliance 412030KS1010.pdf

Name of Attached Document

<1020> Broadband comparability certification Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1030> Attach detailed description for broadband comparability compliance 412030KS1030.pdf

Name of Attached Document

**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**

 FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010>	Study Area Code	412030
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<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Mark M Gailey
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<039>	Contact Email Address - Email Address of person identified in data line <030>	mmgailey@totalcsi.com

<1100> Certify whether terrestrial backhaul options exist (Y/N)

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

(1200) Terms and Condition for Lifeline Customers
Lifeline
Data Collection Form

FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	mmgailey@totalcsi.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP www.totalcsi.com/lifeline-link

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- | | |
|--|-------------------------------------|
| <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, | <input checked="" type="checkbox"/> |
| <1222> Details on the number of minutes provided as part of the plan, | <input checked="" type="checkbox"/> |
| <1223> Additional charges for toll calls, and rates for each such plan. | <input checked="" type="checkbox"/> |

(2005) Price Cap Carrier Additional Documentation

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

July 2013

<010>	Study Area Code	412030
<015>	Study Area Name	TOTAH COMMUNICATIONS
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<030>	Contact Name - Person USAC should contact regarding this data	Mark M Gailey
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<039>	Contact Email Address - Email Address of person identified in data line <030>	mngailey@totelcsi.com

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

- <2011> 3rd Year Certification 47 CFR §54.313(b)(1)(ii) - Note that for the July 2017 certification, this applies to Round 2 recipients of Incremental Support.
- <2022> Recipient certifies, representing year three after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.
- <2023> The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year three - 54.313(b)(2)(ii). Round 2 recipients only.
- <2024A> Round 2 Recipient of Incremental Support?
- <2024B> Attach list of census blocks indicating where funding was spent in year three - 54.313(b)(2)(ii). Round 2 recipients only.
- <2025A> Round 2 Recipient of Incremental Support?
- <2025B> Attach geocoded Information for Phase I milestone reports (Round 2 for year three) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-73, paragraph 35 (May 22, 2013).
- <2015> 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)

Name of Attached Document Listing
Required Information

Name of Attached Document Listing
Required Information

(2005) Price Cap Carrier Additional Documentation

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

July 2013

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

<2016> Certification support used to build broadband

Connect America Phase II Reporting {47 CFR § 54.313(e)}

<2017A> Connect America Fund Phase II recipient?

<2017C> Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2016.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(1)(ii)(A)

Name of Attached Document Listing
Required Information

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(1)(ii)(C)

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Select from the drop down menu or check the boxes below to note compliance with 54.313(f)(1). Privately held carriers must ensure compliance with the financial reporting requirements set forth in 47 CFR 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3009)	Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(iii)		
Yes - Attach Certification			
(3010A)	Certification of Public Interest Obligations {47 CFR § 54.313(f)(1)(i)}	412030KS3010b.pdf	
(3010B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3012A)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}	No - No New Community Anchors	
(3012B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3013)	Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
(3014)	If yes, does your company file the RUS annual report	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:			
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)	<input checked="" type="checkbox"/>	
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows	<input checked="" type="checkbox"/>	
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Required Information	412030OK3017.pdf
(3018)	If the response is no on line 3014, is your company audited?	(Yes/No)	<input type="radio"/> <input type="radio"/>
If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:			
(3019)	Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers	<input type="checkbox"/>	
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>	
(3021)	Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit.	<input type="checkbox"/>	
If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:			
(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers	<input type="checkbox"/>	
(3023)	Underlying information subjected to a review by an independent certified public accountant	<input type="checkbox"/>	
(3024)	Underlying information subjected to an officer certification.	<input type="checkbox"/>	
(3025)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>	
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information	

(3005) Rate Of Return Carrier Additional Documentation (Continued)

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	mmgailey@totelcsi.com

Financial Data Summary

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

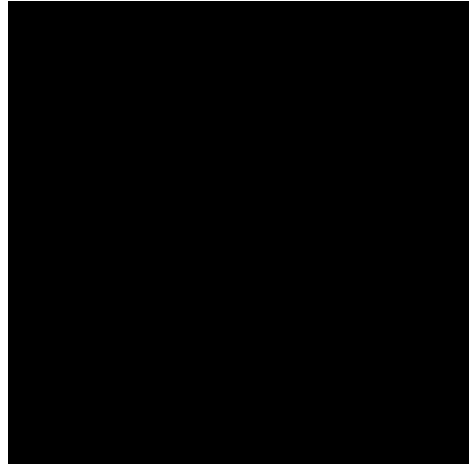
(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends

**Redacted - For Public Inspection**

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4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission’s public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions – FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.

Name of Attached Document Listing Required Information

Broadband Deployment Locations – FCC 14-98 (paragraph 80)

4004a. Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.

Name of Attached Document Listing Required Information

4004b. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area.

Name of Attached Document Listing Required Information

**Certification - Reporting Carrier
Data Collection Form**

 FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

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TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: TOTAH COMMUNICATIONS	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 06/28/2017
Printed name of Authorized Officer: Mark Gailey	
Title or position of Authorized Officer: President	
Telephone number of Authorized Officer: 9185352208 ext.	
Study Area Code of Reporting Carrier: 412030	Filing Due Date for this form: 07/03/2017
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	412030
<015> Study Area Name	TOTAH COMMUNICATIONS
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<039> Contact Email Address - Email Address of person identified in data line <030>	mmgailey@totalcsi.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date:
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	
Name of Authorized Agent Firm:	
Signature of Authorized Agent or Employee of Agent:	Date:
Name of Authorized Agent Employee:	
Title or position of Authorized Agent or Employee of Agent:	
Telephone number of Authorized Agent or Employee of Agent:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

(700) Price Offerings including Voice Rate Data Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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July 2013

<701>	Residential Local Service Charge Effective Date	1/1/2017
<702>	Single State-wide Residential Local Service Charge	

[illegible]

(710) Broadband Price Offerings
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	412030
<015>	Study Area Name	TOTAH COMMUNICATIONS
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Mark M Gailey
<035>	Contact Telephone Number - Number of person identified in data line <030>	9185352208 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mmgailey@totalcsi.com

<711>	<a1>	<a2>	<b1>	<b2>	<c>	<d1>	<d2>	<d3>	<d4>
	State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rates and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service - Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached {select}
	KS	Tyro	32.0	0.0	32.0	1.5	0.5	999999.0	Other, Never Reached
	KS	Tyro	41.5	0.0	41.5	2.5	0.5	999999.0	Other, Never Reached
	KS	Tyro	50.5	0.0	50.5	3.0	0.5	999999.0	Other, Never Reached
	KS	Tyro	65.0	0.0	65.0	4.0	0.5	999999.0	Other, Never Reached
	KS	Tyro	73.5	0.0	73.5	5.0	0.5	999999.0	Other, Never Reached
	KS	Tyro	162.0	0.0	162.0	8.0	0.5	999999.0	Other, Never Reached
	KS	Tyro	175.0	0.0	175.0	10.0	0.5	999999.0	Other, Never Reached
	KS	Elgin	32.0	0.0	32.0	1.5	0.5	999999.0	Other, Never Reached
	KS	Elgin	41.5	0.0	41.5	2.5	0.5	999999.0	Other, Never Reached
	KS	Elgin	50.5	0.0	50.5	3.0	0.5	999999.0	Other, Never Reached
	KS	Elgin	65.0	0.0	65.0	4.0	0.5	999999.0	Other, Never Reached
	KS	Elgin	73.5	0.0	73.5	5.0	0.5	999999.0	Other, Never Reached
	KS	Liberty	32.0	0.0	32.0	1.5	0.5	999999.0	Other, Never Reached
	KS	Liberty	41.5	0.0	41.5	2.5	0.5	999999.0	Other, Never Reached
	KS	Liberty	50.5	0.0	50.5	3.0	0.5	999999.0	Other, Never Reached
	KS	Liberty	65.0	0.0	65.0	4.0	0.5	999999.0	Other, Never Reached
	KS	Liberty	73.5	0.0	73.5	5.0	0.5	999999.0	Other, Never Reached
	KS	Hewins	32.0	0.0	32.0	1.5	0.5	999999.0	Other, Never Reached
	KS	Hewins	41.5	0.0	41.5	2.5	0.5	999999.0	Other, Never Reached
	KS	Hewins	50.5	0.0	50.5	3.0	0.5	999999.0	Other, Never Reached
	KS	Hewins	65.0	0.0	65.0	4.0	0.5	999999.0	Other, Never Reached

(710) Broadband Price Offerings Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	412030
<015>	Study Area Name	TOTAH COMMUNICATIONS
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Mark M Gailey
<035>	Contact Telephone Number - Number of person identified in data line <030>	9185352208 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mgailey@totalcsi.com

[illegible]

(800) Operating Companies	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	412030
<015>	Study Area Name	TOTAH COMMUNICATIONS
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Mark M Gailey
<035>	Contact Telephone Number - Number of person identified in data line <030>	9185352208 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	mmgailey@totalcsi.com
<810>	Reporting Carrier	Totah Communications, Inc.
<811>	Holding Company	Totah Communications, Inc.
<812>	Operating Company	Totah Communications, Inc.

[illegible]

TOTAH COMMUNICATIONS, INC.

QUALITY OF SERVICE AND CUSTOMER PROTECTION PROCESS

(USAC DOCUMENT - 412030KS510.PDF)

TOTAH COMMUNICATIONS, INC.
QUALITY OF SERVICE & CUSTOMER PROTECTION PROCESSES

1. Available Customer Service Representatives to Answer Phones

All calls received by Totah Communications, Inc. during business hours are generally answered by the third ring. When the assigned customer representatives are unable to answer calls by the third ring, calls roll to our out sourced customer service help desk center.

2. Provide After Hours Emergency Customer Service

Calls are generally answered within 60 seconds. Call logs are reviewed daily by personnel. Customer service representatives have been given a list of questions by Totah Communications, Inc. to ask to assist them in resolving any issues. Unresolved issues are reviewed the following work day. Issues requiring immediate attention are sent to the Totah Communications, Inc. service technician on call, who works to resolve the matter as quickly as possible. If that technician is unable to resolve the problem, additional technicians are called. After-hours customer service is also available through our out sourced answering service 24/7.

3. Provide a 24/7 Hour Internet Help Desk Service

All calls are generally answered within 60 seconds. Call logs are reviewed daily by personnel with Managers available to review and address any issues.

4. Give Customers Cut-off Warnings & Provide Bill Arrangement Opportunities

Customers are given two months of missed payments before their service is cut off for non-payment of bill. Notification of the payment due date and the cut-off date are prominently displayed on bills as well as of the opportunity to make payment arrangements to avoid being cut-off.

Customers in danger of losing service also receive an automated call from a customer service representative to remind them of the late payment. If a customer complains that notice was not given, they are directed to speak with a Manager who will work to resolve the matter and prevent it from occurring again. Account balance reports are printed monthly using the company's billing system.

5. Ensure That All New Service Installation Orders Are Fulfilled Promptly

All customers are contacted within 48 hours regarding scheduling the new service installation. If outside plant is already in place, we fill the order at the customers' earliest convenience; if outside plant is not in place, fill the order as soon as the weather permits.

6. Minimize Customer Downtime for Services & Make Requested Changes Promptly

Contact customers regarding all service requests the same day, with a goal of resolving all issues within 48 hours. Any unresolved issues will be resolved contingent upon the technician/customer coordination of access to the premises. Changes requiring key strokes are many times made within the same day as requested.

7. Proactively Monitoring in Case of Major Service Outages

Generally, Service technicians are made aware of outages affecting customers within an hour. It is the goal of Totah Communications, Inc. to resolve major outages within four hours or less. If an outage cannot be resolved within four hours, technicians will begin utilizing all resources, both from within and from without. Technicians establish and accomplish yearly training goals to be better equipped for managing all services.

CUSTOMER PRIVACY

Company Confidential Information Policy

Totah Communications, Inc. has a company policy in place that holds employees accountable for a breach of confidentiality concerning customer data and company information.

The policy states: *"You are reminded that revealing any type of confidential information to unauthorized persons or tampering with or altering company records and/or property is a violation of trust that can result in disciplinary action up to and including discharge."*

Company CPNI Policy

Totah Communications, Inc. has a Customer Proprietary Network Information (CPNI) policy in place that ensures employee compliance with the FCC's CPNI guidelines. Outlined within the policy is a detailed description of CPNI as well as both acceptable and unacceptable CPNI practices. Employees are required to sign waivers stating they understand and agree to comply with the policy and acknowledge that "failure to protect this information result in disciplinary action up to and including discharge for the responsible employee."

As a part of this policy, Totah Communications, Inc. has designated a Compliance Officer responsible for training employees, monitoring CPNI related activities, and reporting breaches.

TOTAH COMMUNICATIONS, INC.

EMERGENCY SITUATION FUNCTIONALITY – AVAILABILITY OF BACK UP POWER

(USAC DOCUMENT - 412030KS610.PDF)

Totah Communications, Inc.
Emergency Response Plan
(Restoration of Service)

CONTACT LIST

Name & Title	Office#
Mark M Gailey mmgailey@totelcsi.com President & General Manager	918 535 2208
Dusty Harper dusty@totelcsi.com Engineering Supervisor	918 535 2208
Keith Watson kewatson@totelcsi.com Executive VP & Controller	918 535 2208

Purpose

The primary purpose of this Emergency Response Plan (the "Plan") is to set forth general guidelines, policies and procedures to be taken in case of an emergency as defined below to enable Totah Communications, Inc. (the "Company") to secure expeditious restoral of service first to local emergency management agencies and then to Company customers in the event of such emergency.

Scope

This Plan, is compliant with the Kansas Corporation Commission (KCC) Rules, shall be followed to the extent possible in the event of an emergency which, for the purposes of this Plan, shall be defined as: (1) service interruptions of such magnitude that conditions affect the entire Company system or a major division thereof; or (2) a situation which, in the judgment of Company management, may cause a high degree of public interest or concern. The conditions which would require use of these procedures are collectively referred to herein as "emergency," "emergency conditions" or "emergency situation."

This Plan recognizes that each emergency will present challenges specific to the situation, but the same general recovery steps should be followed during each emergency. An Emergency Response Team will be established during each emergency to direct the recovery process.

Emergency Response Team

In the event of an emergency, an Emergency Response Team will be established. An Emergency Response Team Coordinator will be designated, and shall be the highest-ranking Company management employee available. Members of the Emergency Response Team will be selected by the Coordinator based upon an assessment of the critical skills and knowledge necessary as they relate to the emergency.

FUNCTIONS OF THE EMERGENCY RESPONSE TEAM

The functions of the Emergency Response Team shall include the following:

I. GENERAL FUNCTIONS

- (A) Make an initial assessment of the extent of the service interruption;
- (B) Determine if the service interruption can be restored by the use of in-house personnel only or whether outside resources will be required;
- (C) Provide priority consideration to restoration of service, where feasible, to emergency services (911/E911 services, hospitals, law enforcement and fire-fighting entities);
- (D) Make immediate assessments of the restoration of service;
- (E) Make a conclusory assessment of the restoration of service.

II. SPECIFIC FUNCTIONS

(A) Communications

The Emergency Response Team Coordinator will, as soon as is practical and feasible, insure that contact is made with the KCC through the Consumer Services Division at (800) 662-0027 or (785) 271-3140. Such notification will, where possible consist of the following information and will be provided as soon as information is available:

- (1) Initial Contact
 - a. Notify KCC of outage;
 - b. Notify KCC of cause of the outage;
 - c. Notify KCC of the area affected; and,
 - d. Notify KCC of the estimated time for repair.

(2) Intermediate Contact

a. Provide status reports as deemed necessary by the Emergency Response Team Coordinator or as requested by the KCC.

(3) Conclusory Contact

a. Final contact advising the KCC of restoral of service.

In addition to the communication responsibilities listed above, the Emergency Response Team Coordinator will insure that contact is made with all appropriate and necessary employees in the affected area and instruct them where to report for purposes of expediting restoration of service.

(B) Damage Assessment

The Emergency Response Team will have the duty of assessing the damage to all Company buildings and outside plant facilities. The Team will also be in charge of determining power outages. The Coordinator will be responsible for the coordination of restoration of power either commercially or with the use of stand-by generators, and also for the coordination of outside contractors which may be utilized by the Company if and when necessary for the restoration of service. The Coordinator will also maintain a list of the contact names and phone numbers where backup generators may be available.

(C) Priority of Restoration

The Emergency Response Team will be responsible for giving priority for restoration of service to the local emergency management agencies (i.e. Police, Fire, Hospital and 911 Center). The Emergency Response Team will restore access to toll service in the event of a toll outage. The Coordinator will also cooperate with emergency agencies for the clearing downed lines and poles from roadways. After service has been restored to all local emergency management agency locations, this team will begin the task of restoring service to all Company customers affected by the emergency.

III. COMPANY EMPLOYEES

The Company believes it is the responsibility of each employee that is a member of the Emergency Response Team to secure his/her family first and then report to the Company. Employees deemed critical to the restoration process will be directed to report to the location requiring their particular skills and expertise.

TOTAH COMMUNICATIONS, INC.
VOICE SERVICES RATE COMPARABILITY
(USAC DOCUMENT - 412030KS1010.PDF)

Voice Services Rate Comparability

Totah Communications, Inc. - Kansas

In compliance with the 54.313 Rules, Totah Communications, Inc. – Kansas must certify that its current rate for fixed voice services is no more than two standard deviations above the national average urban rate for voice service.

According to the 2017 Urban Rate Survey¹ conducted by the FCC's Wireline Competition Bureau, the 2016 rate floor for voice services is \$22.49 and the reasonable comparability benchmark for voice services is \$49.51.

The rates shown on the Voice Pricing Form (0700) are below \$49.51. Consequently, Totah Communications, Inc. - Kansas meets the above mentioned requirement.

¹ WIRELINE COMPETITION BUREAU ANNOUNCES RESULTS OF 2017 URBAN RATE SURVEY FOR FIXED VOICE AND BROADBAND SERVICES, POSTING OF SURVEY DATA AND EXPLANATORY NOTES, AND REQUIRED MINIMUM USAGE ALLOWANCE FOR ETCs SUBJECT TO BROADBAND PUBLIC INTEREST OBLIGATIONS. WC Docket #10-90, DA 17-167 Public Notice - Released February 14th, 2017.

TOTAH COMMUNICATIONS, INC.
BROADBAND RATE COMPARABILITY
(USAC DOCUMENT – 412030KS1030)

BROADBAND RATE COMPARABILITY TOTAH COMMUNICATIONS, INC - KANSAS

BROADBAND BENCHMARK

According to the 2017 Broadband Reasonable Comparability Benchmark conducted by the FCC Wireline Competition Bureau (*and using the Reasonable Comparability Benchmark Calculator supplied by the FCC*), the reasonable comparability benchmark for Broadband rates are as follows¹:

Download Speed	Upload Speed	Usage Allowance	Benchmark
6 Mbps	1 Mbps	Unlimited	\$71.27
15 Mbps	3 Mbps	Unlimited	\$83.82
25 Mbps	5 Mbps	Unlimited	\$90.77

RATE REQUIREMENT

Per 47 C.F.R. § 54.313(a)(12), Totah Communications, Inc. - Kansas pricing can be no more than the applicable benchmark as published annually by the Wireline Competition Bureau. The rates shown on Totah Communications, Inc. – Kansas’ Broadband Price Offerings Form (0710) are all below the FCC’s 2016 Broadband Pricing Benchmarks. Consequently, Totah Communications, Inc. - Kansas meets the above mentioned requirement.

The Survey also noted that the required minimum usage allowance is 150GBs for rate-of-return carriers, such as Totah Communications, Inc. - Kansas. Totah Communications, Inc. - Kansas does not currently implement a usage allowance maximum. All broadband customers have unlimited usage allowance.

¹ <http://www.fcc.gov/encyclopedia/urban-rate-survey-data>

TOTAH COMMUNICATIONS, INC.

MILESTONE CERTIFICATION

(USAC DOCUMENT - 412030KS3010.PDF)

Progress Report on 5 Year Plan

Line 3010(a) - Milestone Certification

Total Communications, Inc. - Kansas certifies that, upon a reasonable request, it will provide Broadband services at actual speeds of 4Mbps downstream / 1Mbps upstream, with latency suitable for real-time applications, including VoIP and usage capacity that is reasonably comparable to urban areas and that requests for such services are met within a reasonable amount of time.

TOTAH COMMUNICATIONS, INC.
CONSOLIDATED FINANCIAL STATEMENTS
(USAC DOCUMENT - 412030KS3017.PDF)

Redacted - For Public Inspection

FINANCIAL AND STATISTICAL REPORT FOR BROADBAND BORROWERS

OK1111

PERIOD ENDING

December, 2016

PART B. STATEMENTS OF INCOME AND RETAINED EARNINGS OR MARGINS

ITEM

YEAR-TO-DATE

1. Local Network Services Revenues

a. Voice

b. Video

c. Internet

i. Broadband

ii. Other

2. Network Access Services and Long Distance Revenues

3. Miscellaneous Revenues

4. Other Operating Income

5. Uncollectible Revenues

6. Net Operating Revenues (11 thru 4 less 5)

7. Plant Specific Operations Expense

8. Plant Nonspecific Operations Expense

(Excluding Depreciation & Amortization)

9. Customer Operations Expense

10. Corporate Operations Expense

11. Other Operating Expenses

12. Total Operating Expenses (7 thru 11)

13. Operating Income or Margins (6 less 12)

14. Nonoperating/Nonregulated Net Income

15. EBIDTA (13 + 14)

16. Depreciation Expense

17. Amortization Expense

18. EBIT (15 - 16 - 17)

19. Interest on Funded Debt

20. Other Interest Expense

21. Taxes

a. Property

b. Income

22. Total Net Income or Margins**(18-19-20-21)**

23 Dividends Declared (Common)

24 Dividends Paid

25 Transfers to Patronage Capital

26 Principal Payments on Long Term Debt and Capital Leases

27 TIER (19 + 20 + 22) / (19 + 20)

<div>USDA-RUS</div> <div>FINANCIAL AND STATISTICAL REPORT FOR BROADBAND BORROWERS</div>				BORROWER DESIGNATION OK1111	
				PERIOD ENDING December, 2016	

PART C. SERVICES						
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		1. RATES		2. SUBSCRIBERS		
		Residential	Business	Residential	Business	Total
No.	SERVICE OFFERINGS	(a)	(b)	(a)	(b)	(c)
	Broadband Data Packages					
1	2.5M/2.5M					
2	4M/4M					
3	1.5M/1.5M					
4	3M/3M					
5	5M/5M					
6	10M/10M					
7	8M/8M					
	Nonbroadband Data Packages					
8						
9						
10						
	Voice Packages					
11	Local - OK					
12	Local - KS					
13	Local - OK					

**FINANCIAL AND STATISTICAL REPORT
FOR BROADBAND BORROWERS**

BORROWER DESIGNATION

OK1111

PERIOD ENDING

December, 2016

PART D. STATEMENT OF CASH FLOWS

1.	Beginning Cash
CASH FLOWS FROM OPERATING ACTIVITIES:	
2.	Net Income
<i>Adjustments to Reconcile Net Income to Net Cash Provided by Operating Activities</i>	
3.	Add: Depreciation
4.	Add: Amortization
5.	Other (Explain) Prior year loss not booked and change in APBO.
<i>Changes in Operating Assets and Liabilities:</i>	
6.	Decrease/(Increase) in Accounts Receivable
7.	Decrease/(Increase) in Materials and Inventory
8.	Decrease/(Increase) in Other Current Assets
9.	Increase/(Decrease) in Accounts Payable
10.	Increase/(Decrease) in Other Current Liabilities
11.	Net Cash Provided/(Used) by Operations
CASH FLOWS FROM FINANCING ACTIVITIES:	
12.	Decrease/(Increase) in Notes Receivable
13.	Increase/(Decrease) in Notes Payable
14.	Plus/(Less) Net Increase/(Decrease) in Long Term Debt (including current maturities)
15.	Plus: Increase/(Less: Decrease) in Capital Stock, Paid-in Capital or Membership and Capital Certificates
16.	Less: Payment of Dividends
17.	Other (Explain) Changes in Capital Stock.
18.	Net Cash Provided/ (Used) by Financing Activities
CASH FLOWS FROM INVESTING ACTIVITIES:	
19.	Net Capital Expenditures
20.	Long-Term Investments
21.	Other (Explain)
22.	Net Cash Provided (Used) by Investing Activities
23.	Net Increase/ (Decrease) in Cash
24.	Ending Cash

**FINANCIAL AND STATISTICAL REPORT
FOR BROADBAND BORROWERS**

OK1111

PERIOD ENDING

December, 2016

PART E. BIP PERFORMANCE MEASURES

New Broadband Service

Improved Broadband Service

1. Number of households subscribing to
2. Number of businesses subscribing to
3. Number of educational providers receiving
4. Number of libraries receiving
5. Number of health care providers receiving
6. Number of public safety providers receiving

<div>USDA-RUS</div> <div>FINANCIAL AND STATISTICAL REPORT FOR BROADBAND BORROWERS</div>	<div>BORROWER DESIGNATION</div> <div>OK1111</div> <div>PERIOD ENDING</div> <div>December, 2016</div>
Notes to Operating Report - Broadband	